

# **EXHIBIT J**

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

DOLORES SAMUEL, individually and on behalf §  
of the estate of JULIUS PAYE KEHYEI, §  
DECEDENT, and MAYA THORN as NEXT §  
FRIEND OF MINOR, S.T., §  
§

Plaintiffs, §

v. §

CITY OF HOUSTON, TEXAS, §  
K. DREY, *Individually*, and JOHN DOE HPD §  
OFFICERS 1-10, §  
§

Defendants. §

CIVIL ACTION NO. 4:22-cv-2900  
JURY TRIAL DEMANDED

**PLAINTIFFS' INITIAL DISCLOSURES**

Pursuant to Rule 26 (a) (1) of the Federal Rules of Civil Procedure and order of the Court, Plaintiffs Dolores Samuel, individually, and Maya Thorn as Next Friend of S.T., the minor daughter of Julius Paye Kehyei and on behalf of the Estate of Julius Paye Kehyei, (“Kehyei”) deceased, hereby make the following initial disclosures:

Respectfully submitted,

By: /s/ Daryl K. Washington  
Daryl K. Washington  
State Bar No. 24013714  
WASHINGTON LAW FIRM, PC  
325 N. St. Paul St., Suite 3950  
Dallas, Texas 75201  
214-880-4883  
214-751-6685 - fax  
Email: dwashington@dwashlawfirm.com

**ATTORNEY FOR PLAINTIFFS**

**CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of Plaintiffs' Initial Disclosures have been served on the following on the 5<sup>th</sup> of June, 2024:

Alexander Garcia  
Assistant City Attorney  
City of Houston Legal Department  
900 Bagby Street, 4th Floor 2, P.O. Box 368,  
Houston, Texas 77002-0368

/s/ Daryl K. Washington

DARYL K. WASHINGTON

A. Individuals with Discoverable Information

**A. The names and, if known, the addresses and telephone numbers of each individual likely to have discoverable information that the disclosing party may use to support their claims, unless solely for impeachment, identifying the subjects of the information.**

(1) Dolores Samuel  
c/o Daryl K. Washington  
Washington Law Firm, P.C.  
325 N. St. Paul, Suite 3950  
Dallas, Texas 75201  
Telephone: (214) 880-4883  
Facsimile: (214) 751-6685  
Plaintiff

Dolores Samuel is the mother of Julius Paye Kehyei. She has knowledge of the incident resulting in her injuries and damages. Mrs. Samuels will testify to the impact the death of Julius has on her and his child. Mrs. Samuels will testify to the damages claimed by the estate of Julius Paye Kehyei, including funeral expenses, loss wages, the goals and dreams of Julius.

(2) Maya Thorn as Next Friend of S.T.  
and behalf of the estate of Julius Paye Kehyei  
c/o Daryl K. Washington  
Washington Law Firm, P.C.  
325 N. St. Paul, Suite 3950  
Dallas, Texas 75201  
Telephone: (214) 880-4883  
Facsimile: (214) 751-6685  
Plaintiff

Maya is the mother and next friend of minor S.T. She has knowledge of the incident resulting in the death of Julius. Maya will testify to the impact the death of Julius has on her minor child. Maya will testify to the damages claimed by the estate of Julius Paye Kehyei, including funeral expenses, and the goals Julius set before his tragic death.

(3) Kyle Drey  
c/o Alexander Garcia  
Assistant City Attorney  
City of Houston Legal Department  
900 Bagby Street, 4th Floor 2,  
P.O. Box 368  
Houston, Texas 77002-0368  
Defendant

Defendant Drey has knowledge of the incident resulting in the death of Julius Paye Kehyei, the policies and procedures regarding the use of excessive force, the violation of Julius's civil rights,

training provided by the Houston Police Department, and the actions of the Houston Police Department.

(4) The City of Houston, Texas  
c/o Alexander Garcia  
Assistant City Attorney  
City of Houston Legal Department  
900 Bagby Street, 4th Floor 2,  
P.O. Box 368  
Houston, Texas 77002-0368

Defendant The city of Houston has knowledge of the incident resulting in Julius Paye Kehyei's death, the policies and procedures regarding the use of excessive force, the violation of Julius Paye Kehyei's civil rights, training provided by the Houston Police Department, and the actions of the Defendants.

(5) Former Chief of Police Troy Finner  
c/o Alexander Garcia  
Assistant City Attorney  
City of Houston Legal Department  
900 Bagby Street, 4th Floor 2,  
P.O. Box 368  
Houston, Texas 77002-0368

Chief of Police Troy Finner has knowledge of the incident resulting in Julius Paye Kehyei's death, the policies and procedures regarding the use of excessive force, the violation of Julius Paye Kehyei's civil rights, training provided by the Houston Police Department, and the actions of the Defendant Officers.

(6) Former Mayor Sylvester Turner  
c/o Alexander Garcia  
Assistant City Attorney  
City of Houston Legal Department  
900 Bagby Street, 4th Floor 2,  
P.O. Box 368  
Houston, Texas 77002-0368

Mayor Turner has knowledge of the incident resulting in Julius Paye Kehyei's death, the policies and procedures regarding the use of excessive force, the violation of Julius Paye Kehyei's civil rights, training provided by the Houston Police Department, and the actions of the Defendant Officer.

**Investigative Officers and First Responders:**

It is anticipated that the individuals named below will likely have discoverable information regarding the circumstances alleged in the complaint, including, but not limited to their

investigation of the incident, their observations on the day of the incident; their understanding of how the incident may have occurred; and the conversations they may have heard from other witnesses or from any other party relating to the incident in question.

(7) Custodian of Records and/or Agents  
 Houston Forensic Science Center  
 500 Jefferson, 13<sup>th</sup> floor  
 Houston, Texas 77002  
 (713) 645-0743

*The technicians and/or analysts processed the crime scene and performed forensic examinations..*

(8) Michael Norwood  
 (9) Kevin Schulz  
 (10) Brian Siler  
 (11) Lars Thestrup  
 (12) Jason Weyer

Officers, Employees, Agents, and/or Custodians of Records  
 Houston Fire Department  
 c/o Alexander Garcia  
 City of Houston Legal Department  
 P.O. Box 368  
 Houston, TX 77001  
 (832) 393-6438

(13) Domenick Alagna  
 (14) Richard Araiza  
 (15) Cody Ballard  
 (16) Larry Baimbridge, Jr.  
 (17) Gustavo Barron  
 (18) Richard Bass  
 (19) Jaime Beitia  
 (20) Richard Besselman  
 (21) Marcos Betancourt  
 (22) Kenneth Bigger  
 (23) Eric Blankenship  
 (24) James Bonnin  
 (25) Oscar Cavazos  
 (26) Nicole Chandler  
 (27) Juan Chavez-Resendiz  
 (28) Brian Cheng  
 (29) L. Childress  
 (30) Mary Childs-Henry  
 (31) Keven Chinchilla-Rodas  
 (32) Courtney Cross  
 (33) Tiffany Cunningham  
 (34) Aaron Day

(35) Andrew de la Garza  
(36) Charles Dexter  
(37) Kenneth Elliott  
(38) Connor Evans  
(39) Danny Flores  
(40) Eric Flores  
(41) Darius Franklin  
(42) Jeffrey Frye  
(43) Dennis Garrett  
(44) Jonathan Garza  
(45) Andrew Giles  
(46) Andrew de la Guardia  
(47) Steven Hamala  
(48) John Harnett  
(49) Joseph Harnett  
(50) Kelsey Hartzheim  
(51) Christopher Herring  
(52) Michael Hewitt  
(53) Scott Holder  
(54) Erik Holland  
(55) Daryl Hudeck  
(56) Scott Irwin  
(57) Rafeal Johnson  
(58) Jeffrey Laird  
(59) Daniel Leos  
(60) Luis Lopez  
(61) Joseph Mabasa  
(62) Silvia Martinez  
(63) Kevin McDaniel  
(64) Jeffrey Michael  
(65) Matthew Millington  
(66) Gary Moran  
(67) Kimberly Jones Mushtaq  
(68) Jesus Morillon  
(69) Dalton Morrison  
(70) Fredrick Morrison  
(71) Michael Mulcahey  
(72) Wesley Nail  
(73) Phi Nguyen  
(74) Leslie Ochoa Carrillo  
(75) Russell Phillips  
(76) Kimberly Raith  
(77) Victor Regla  
(78) Roderick Rickett  
(79) Jorge Rincones  
(80) Maria Rodriguez  
(81) Roland Rosas  
(82) Jacob Ruiz  
(83) Tracy Saldivar

- (84) Jesse Seay
- (85) Dennis Shadden
- (86) Derrick Skinner
- (87) Mary Standlee
- (88) Eric Sutton
- (89) Jalissa Taylor
- (90) Joseph Torres
- (91) Lucia Vieira
- (92) Delinda Wilker
- (93) Brian Wilson
- (94) Greyson Wilson
- (95) Kalee Winford
- (96) Kathleen Wingert
- (97) Kristi Young
- (98). Maggie Zufall

Officers, Employees, Agents, and/or Custodians of Records

City of Houston Police Department

c/o Alexander Garcia

City of Houston Legal Department

P.O. Box 368

Houston, TX 77001

I.

**RETAINED EXPERTS**

- 99. Daryl K. Washington  
WASHINGTON LAW FIRM, P.C.  
325 N. St. Paul, Suite 3950  
Dallas, TX 75201

Mr. Washington may provide testimony regarding reasonable and necessary attorneys' fees. He will testify that factors he considers in determining reasonableness include "the time and labor required; the nature and difficulty of the responsibility assumed; the amount involved and the results obtained; the fees customarily charged for similar legal services; the experience, reputation, and ability of counsel; the fee arrangement existing between counsel and the client; and the risks taken and difficulties that were overcome by counsel in accepting an engagement of this type." Mr. Washington has been licensed since 1999 and has been with The Washington Law Firm, P.C. since March 2009. Prior to March 2009, Mr. Washington was a partner at Shackelford Melton & McKinley, LLP and also practiced at Godwin Pappas, LLP and Jackson Walker.

Mr. Washington's practice is concentrated in Civil Rights Law (police misconduct, police brutality, and wrongful death), Personal Injury, and Business Transactions. Washington represents clients in state and federal courts throughout the country.

Mr. Washington is a member of the Dallas Bar Association, where he served as the 2006-2007 chair of the Judicial Investiture Committee. He served on the DBA Board of Directors from 2003-04. Mr. Washington was a Patrick E. Higginbotham American Inns of Court member for 2006-09. He served as Deputy Chief of Staff for National Bar Association President Rodney G. Moore in 2008-2009. He currently serves on the Boards of Southern University Law Center

Alumni Association, Grambling State University College of Business Advisory Board and formerly served as the Deputy General Counsel to the President of the National Bar Association. He currently serves as the Director of Communications for the National Bar Association. Mr. Washington has been involved in numerous civil rights cases and has provided expert analyses as to the reasonableness and necessity of attorneys' fees.

II.

**NON RETAINED EXPERTS**

Although none of the following are retained experts, to the extent their testimony might constitute expert testimony, Plaintiffs reserve the right to examine the following witnesses and to solicit testimony:

(100) Morna Gonsoulin, M.D., Assistant Medical Examiner  
(101) Paulyann Maclayton, Forensic Pathology Fellow  
(102) Dwayne Wolf, Deputy Chief Medical Examiner  
(103) Kelsey Cooper, Case Reviewer  
(104) Pramod Gumpeni, M.D.  
(105) Anna Kelly, Expert Reviewer  
Agents and/or Custodian of Records  
Harris County Institute of Forensic Sciences  
1861 Old Spanish Trail  
Houston, TX 77054

The above individuals performed the autopsy on Julius Paye Kehyei. It is expected that they will give an opinion that Julius Paye Kehyei died as a result of a gunshot wound. The medical examiners will also testify as to the manner of death, and may opine, within a reasonable degree of medical and/or psychological certainty, as to the nature and extent of Julius Paye Kehyei's agonal period. The findings are more fully expressed in the Autopsy Report they completed regarding the subject death. The Autopsy Report will be available through discovery in this action. Plaintiffs reserve the right to supplement her designation once the autopsy report is received.

**B. A copy of, or a description by category and location of, all documents, data compilations, and tangible things that are in the possession, custody or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment.**

**RESPONSE:** The following documents and tangible things are in the possession, custody and control of the Plaintiffs:

1. Upon information and belief, the investigative file of the investigation produced by the Defendants.

2. Records of the responding emergency personnel.
3. Upon information and belief, a copy of the police reports produced by the Defendants.
4. Photos
5. Funeral Bill
6. Death Certificate
7. Birth Certificate

**C. A computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered.**

**RESPONSE:** Plaintiffs are entitled to recover all actionable damages as well as damages for past and future pain and suffering, emotional pain and suffering, past and future lost earnings, funeral expenses, loss of inheritance, loss of life, reasonable and necessary attorneys' fees, and punitive damages. In addition, Plaintiffs will retain an economic damages expert who will calculate damages.

Plaintiffs reserve the right under the Federal Rules of Civil Procedure to supplement or amend their responses upon further discovery proceedings or investigation, or in connection with the rebuttal of any of Defendants' evidence.

**D. Any insurance agreement under which any person carrying on an insurance business may be liable to satisfy all or part of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.**

**RESPONSE:** Plaintiffs have no such insurance agreements.

The above disclosures made by Plaintiffs are based on the information reasonably available to them and their counsel at this time. Additionally, Plaintiffs incorporate verbatim and by reference any person with knowledge, pictures and/or video produced and/or identified by Defendants in this matter. Plaintiffs state that discovery and investigation of the claims, damages and defenses in this matter are continuing. Plaintiffs accordingly reserve the right to supplement this disclosure at a future date. Nothing herein constitutes a waiver of any attorney-client or attorney work product privileges.